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6 Attorney for Defendants

7 PFIZER INC., including its former

8 division J.B. ROERIG & CO., PFIZER

INTERNATIONAL LLC, AND

9 GREENSTONE LLC

10 UNITED STATES DISTRICT COURT

11
12 NORTHERN DISTRICT OF CALIFORNIA

13 A.B., a minor, by ANN BARBER,) CASE NO.: 3:13-cv-01006-JST

14 Natural Guardian, and ANN BARBER,)

15 Individually; M.F., a minor, by)

ADRIENNE FARUGIA, Natural)

16 Guardian, and ADRIENNE FARUGIA,) JOINT STIPULATED REQUEST

17 Individually; L.F., a minor, by JAMIE) FOR ORDER CHANGING TIME

JONES, Natural Guardian, and JAMIE)

18 JONES, Individually; K.G., a minor, by)

19 SIERRA GALLAGHER, Natural)

Guardian, and SIERRA GALLAGHER,)

20 Individually; M.H., a minor, by MARY)

21 ANN HONN, Natural Guardian, and)

MARY ANN HONN, Individually;)

22 A.H., a minor, by MARTHA)

23 THOMPSON, Natural Guardian, and)

MARTHA THOMPSON, Individually;)

24 J.L., a minor, by EVELYN PARDO,)

25 Natural Guardian, and EVELYN)

PARDO, Individually; C.P., a minor, by)

26 STEPHANIE TUCKER, Natural)

27 Guardian, and STEPHANIE TUCKER,)

Individually; D.R., a minor, by SANDI)

28 RICHARD, Natural Guardian, and)

1 SANDI RICHARD, Individually; D.S., a)
2 minor, by DEBRA SCHEDLBAUER,)
Natural Guardian, and DEBRA)
3 SCHEDLBAUER, Individually; D.S., a)
4 minor, by AMANDA TEMPLE, Natural)
Guardian, and AMANDA TEMPLE,)
5 Individually; E.V.M., a minor, by)
6 CECILIA VASQUEZ, Natural)
Guardian, and CECILIA VASQUEZ,)
7 Individually,)

8)
9 Plaintiffs,)

10 v.)

11 PFIZER, INC; PFIZER)
12 INTERNATIONAL, LLC; J.B.)
ROERIG & CO.; GREENSTONE, LLC;)
13 MCKESSON CORPORATION,)
14 individually and D/B/A NORTHSTAR)
RX LLC; and DOES 1 THROUGH 100,)
15 Inclusive,)

16)
17 Defendants.)

1 **JOINT STIPULATED REQUEST FOR ORDER CHANGING TIME**

2 This Stipulation is entered into by and among the parties hereto, through their
3 respective undersigned attorneys, with reference to the following facts:

4 WHEREAS, on March 6, 2013, Defendants Pfizer Inc., including its former
5 division J.B. Roerig & Co., Pfizer International LLC, and Greenstone LLC (together,
6 “Defendants”) removed this case to this Court (Dkt. 1);

7 WHEREAS, on April 17, 2012, the Judicial Panel on Multidistrict Litigation
8 (“JPML”) established the Zoloft multidistrict litigation (“MDL”) to coordinate all
9 federal product liability cases that allege birth defects due to maternal use of Zoloft, an
10 antidepressant medication manufactured and sold by Pfizer Inc. *See In re Zoloft*
11 *(Sertraline Hydrochloride) Prods. Liab. Litig.*, 856 F. Supp. 2d 1347 (J.P.M.L. 2012);

12 WHEREAS, on March 8, 2013, Defendants filed a Notice of Potential
13 Tag-Along with the JPML, identifying this action as appropriate for inclusion in the
14 Zoloft MDL (MDL No. 2342, Dkt. 357);

15 WHEREAS, on March 13, 2013, the Clerk of the Panel issued a Conditional
16 Transfer Order (“CTO-35”) (*see id.*, Dkt. 358), which, had it been finalized, would
17 have transferred this action to the Zoloft MDL;

18 WHEREAS, on April 3, 2013, Plaintiffs moved to vacate CTO-35 (*see id.*, Dkt.
19 373);

20 WHEREAS, Plaintiffs’ motion to vacate has been fully briefed and the JPML is
21 scheduled to hear the motion during the next Panel hearing session on May 30, 2013;

22 WHEREAS, on March 12, 2013, this Court entered an Order setting a Case
23 Management Conference for June 19, 2013;

24 WHEREAS, the parties have agreed to seek a continuance of the June 19, 2013,
25 Case Management Conference and resultant deadlines, pending a decision by the
26 JPML on transfer of this action to the Zoloft MDL;

1 WHEREAS, the parties have further agreed that they will submit a joint letter to
 2 this Court upon learning of the JPML's decision on transfer of this action to the Zolof
 3 MDL, and, if the MDL motion is denied and this action remains in federal court, the
 4 parties will be available for a Case Management Conference at the Court's
 5 convenience, and, if possible, no later than 45 days after the JPML's decision;

6 WHEREAS, the requested continuance of the Case Management Conference
 7 scheduled for June 19, 2013, would have no effect on the hearing on Plaintiffs' Motion
 8 to Remand and Defendants' Motion to Stay, currently scheduled for June 20, 2013;
 9 and

10 WHEREAS, Plaintiffs and Defendants previously filed a joint stipulated
 11 request for an order extending the time for Plaintiffs to file a reply brief in support of
 12 their motion to remand (Dkt. 31). There have been no other time modifications in this
 13 case, either by stipulation or Court order.

14 THEREFORE IT IS HEREBY STIPULATED and JOINTLY REQUESTED
 15 that the June 19, 2013, Scheduling Conference and resultant deadlines be continued,
 16 as set forth above.

17 Dated: May 28, 2013

18
 19 By: /s/ Marissa C. Langhoff
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 21 Napoli Bern Ripka Shkolnik
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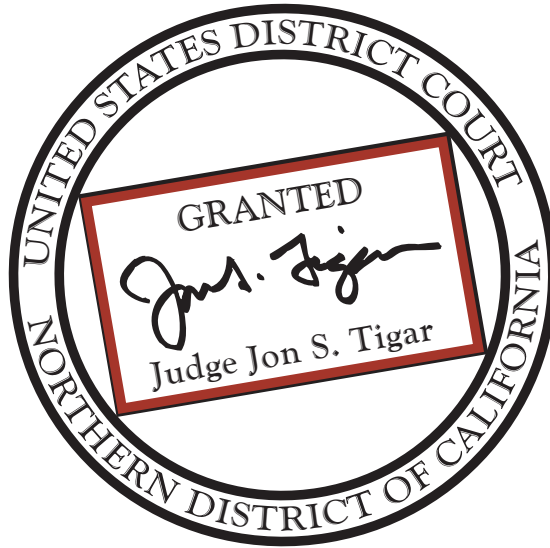
By: /s/ Karin Kramer
 Karin Kramer
*For Defendants Pfizer Inc.,
 including its former division J.B.
 Roerig & Co., Pfizer International
 LLC, and Greenstone LLC*

Respectfully submitted,

QUINN EMANUEL URQUHART &
 SULLIVAN, LLP

By: /s/ Karin Kramer
 Karin Kramer

*Attorneys for Defendants Pfizer Inc.,
including its former division J.B. Roerig
& Co., Pfizer International LLC, and
Greenstone LLC*



Dated: May 30, 2013